

SAPIEN PRIVACY POLICY

WHY SHOULD I READ THIS POLICY

You are about to use or already are using the Services. When you use the Services, Sapien collects, stores, or otherwise processes your personal data (for example, name, last name, your location data, phone number, etc.). Sapien collects personal information about you in order to provide the services you are asking for and in connection with its business activities. In some cases, Sapien may ask your consent to special types of processing.

IF YOU DO NOT WANT SAPIEN TO COLLECT AND TO PROCESS YOUR DATA AT ALL, PLEASE DO NOT USE THE SERVICES.

Sapien has prepared this Policy to give you the opportunity to get detailed information about what Sapien does with your personal information, what consequences this might have for you, your rights in respect to your personal data, and how you can control your personal data.

You may also address to this Policy after accepting it if you have any additional questions when using the Services.

WHAT IS THIS POLICY ABOUT

In this Policy, Sapien will tell you about the following:

- who Sapien is, its name, location, how Sapien can be contacted;
- about the data Sapien collects and processes about users, as well as the purposes for which Sapien collects and processes data;
- risks that personal data processing can bring to the users;
- basic rights of the users regarding their personal data, what control options the user has in relation to his or her personal data.

For your convenience here is placed the content of this Policy:

- Age restrictions
- What should I do if I do not understand something in this Policy?
- What data is collected by Sapien and how is it used?
- Consequences of processing of personal data
- On what legal grounds does Sapien collect and otherwise process my personal data?

- For which purposes does Sapien collect and otherwise process my personal data?
- Why does Sapien collect so much data?
- How long does Sapien store my personal data?
- To whom does Sapien provide my personal data?
- Data transfers outside the EU
- Automated decision-making, profiling,
- Profiling and advertising
- Profiling, advertising and sensitive data
- How can I control my data (Your rights in respect to your data)?
- Contact Sapien
- Changes to the Policy
- Miscellaneous

AGE RESTRICTIONS

By registering in and using the Services, you confirm that you are at least 13 years old and you have reached the appropriate age that allows you independently to enter into contracts in your own country.

When Sapien asks you to give the consent to the processing of personal data, you can do it independently on reaching a certain age. By registering in and using the Services, you confirm that you are at least 13 years old and you have reached the appropriate age that allows you to consent to the processing of personal data in your country without prior approval of your parents or holder of parental responsibility over you.

If you are not sure about whether you can independently consent to the processing of personal data, please contact your authorized personal data protection authority in your country.

Sapien may ask you to submit additional documents or to pass through additional procedures to make sure that you are already 13 years old.

WHAT SHOULD I DO IF I DO NOT UNDERSTAND SOMETHING IN THIS POLICY?

When Sapien was preparing this Policy, Sapien wanted to be as simple as possible and easy to understand by adults and children, who are users. Sapien tried to put all the important information here using plain and clear language. However, if something in this Policy is not clear for you, perceived ambiguously, thrills you or you have additional questions, Sapien encourages you to contact Sapien at: sapien.promo@gmail.com

Sapien will be grateful for your feedback regarding this Policy, because each feedback helps Sapien to improve this Policy, make it more transparent, and clear to all users.

WHAT DATA IS COLLECTED BY SAPIEN AND HOW IS IT USED?

Sapien receives and collects data on users in several ways:

- directly from you;
- when you use the Services and as a result of monitoring of your activity in the Services;
- from third parties.

You will find more details about these three ways below.

1) Sapien collects information that you give or fill in. For example, when a user logs in to use the Services and during the registration or subsequently fills in information about himself or herself in her or his account, Sapien collects data such as:

- user's name and surname;
- user's nickname and user's displayname;
- age of the user and date of birth of the user;
- e-mail address of the user;
- phone number of the user;
- user's avatar;
- image of the user's face (only if the user has passed through a face-verification procedure)
- LinkedIn and Facebook links (by users choice)

Also Sapien collects data, which you provide about yourself when you contact Sapien support team for solving some problems, which may arise when you use the Services.

2) Sapien collects information when you use the Services and by monitoring your behavior in the Services. When a user uses the Services, Sapien collects and processes such personal data and personal information as:

- Information about the user's device. When a user creates an account and/or uses the Services, Sapien collects information about the device from which the user created an account and/or entered the Services, including device model information, operating system version information embedded in the device.

- Information about preferences and interests. By observing your behavior in the Services, Sapien makes certain conclusions and assumptions about your interests and preferences, and Sapien may place you in some category, offer you similar content or users, and if you wish to view advertisements, offer you advertisements based on your interests and preferences.
- Sensitive information. By observing your behavior in the Services, Sapien may indirectly and unknowingly obtain some sensitive information about you. You can read more about this in the section on profiling, advertising and sensitive data.
- Sapien also collects information about your activity when using Services other than the mobile application, if you use them. In particular, Sapien collects information for analytical purposes (including providing you with analytics) regarding your offers for sale of goods/services, the effectiveness of your sales of goods and/or services, regarding your advertising campaigns carried out by Sapien Ads and their effectiveness in order to provide you with opportunities and tools to improve your business and to introduce new services.

PLEASE NOTE THAT NOT ALL DATA SPECIFIED IN THIS POLICY SHALL BE NECESSARILY COLLECTED AND PROCESSED ABOUT YOU AS OF NOW. IF YOU WANT TO FIND OUT AN EXHAUSTIVE LIST OF DATA, WHICH SAPIEN HAS ABOUT YOU, YOU MAY USE YOUR RIGHT TO ACCESS INFORMATION ABOUT YOURSELF.

CONSEQUENCES OF PROCESSING OF PERSONAL DATA

When using the Internet, you should always keep in mind safety, and the use of the Services is not the exemption. It is important to keep in mind what content you share with others, and that, for example, other users can clearly identify where you are now just from the analysis of your posts. You should also keep in mind that any user can copy the content you share and post it on other resources.

Please note if you delete your account, some personal data will remain in Sapien's system in anonymized form, it will be stored in such a way that it will be impossible to identify the user. This is necessary to give Sapien an opportunity to check whether a user was previously registered or not. Sapien will use such data only in order to prevent fraud, when a user who violates the terms and conditions and whose account was deleted will attempt to re-register within the Sapien system again. By saving such data, Sapien will rely on its legitimate interest.

ON WHAT LEGAL GROUNDS DOES SAPIEN COLLECT AND OTHERWISE PROCESS MY PERSONAL DATA?

Sapien collects and processes your data based on the following legal grounds:

- One of the reasons why Sapien collects and processes user's data is the existence of a contract between the user and Sapien. By registering in and using Services, you and Sapien conclude a contract for the provision of services. In order to provide you with services Sapien must collect and process certain data about you. For example, because the Sapien application is a geolocation application and promises you to show you users who are near you on real time, Sapien should collect information about your location, because without it Sapien simply will not be able to provide to you the services you ask for.
- Legitimate interest. Another reason for the collection and processing of your data is legitimate interest pursued by Sapien or by third party. Sapien uses a legitimate interest in processing your data, for example, when Sapien processes your data to fix bugs in the Services and to ensure its smooth operation, to improve and to enhance the work of the Services, to develop and to introduce new functions and services, to ensure security of the users of the Services, and to ensure secure work of the Services, to transfer data within the organizational structure of Sapien, for example, to affiliated companies, to transfer certain information at the request of the intellectual property rights holders who claim that a particular user has placed illegal content. It is important to emphasize that Sapien will not use legitimate interest as a basis for processing of user data if the rights, freedoms and interests of the users of the Services override the interest of Sapien or third party.

- Legislative requirements. Sapien may process user's data, if it is required by the law that applies to Sapien. For example, Sapien may provide data on users at the request of courts or other authorized bodies or when collection and identification are required by the legislation on financial monitoring and prevention of money laundering or by other applicable law.
- Consent. Sapien relies solely upon the user's consent when uses personal user data for the purpose of displaying targeted advertising, marketing and promotional mailing, or for other purposes for which a specific user's consent must be granted.

FOR WHICH PURPOSES DOES SAPIEN COLLECT AND OTHERWISE PROCESS MY PERSONAL DATA?

Sapien collects and processes personal user data for the following purposes:

- direct work of the Services and the provision of the relevant services to the users;
- fixing bugs in the Services and ensuring the proper operation of the Services;
- improving and enhancing of the Services and developing and introducing of new services and functions;
- ensuring the safety and security of the users of the Services and the safety and security of the provision of the Services;
- profiling of the users and making on its basis automated decisions (including solely automated decisions);
- profiling of the users and use of the users' profiles in order to display targeted advertising to such users;
- for advertising and marketing activities;
- to monitor the compliance of users with the terms and conditions of the Services;
- in order to contact the user.

FOR WHICH PURPOSES DOES SAPIEN COLLECT AND OTHERWISE PROCESS MY PERSONAL DATA?

Here are some examples, which help you to understand these purposes.

Example 1

This example illustrates one of the cases when Sapien uses user's data directly for the Services provision. Sapien collects user location data because Sapien application is a geolocation application, and one of the ideas embodied in its work is to show to user other user who are near the user on real time, as well as the other activity that is near the user on real time. The overwhelming majority of existing services and functions that will soon appear in the Services are based on the user's location, so the use of the Sapien application without access to the user's geolocation is impossible, **Sapien simply will not be able to provide you with the services you asked without using your geolocation data.**

PLEASE NOTE: IF FOR SOME REASONS, IT IS UNACCEPTABLE FOR YOU THAT SAPIEN COLLECTS DATA ABOUT YOUR LOCATION, PLEASE DO NOT USE SAPIEN APPLICATION, AND IF YOU ARE ALREADY USING SAPIEN APPLICATION, YOU CAN ALWAYS DELETE YOUR ACCOUNT.

Sapien collects the data that identifies you, including your last name, name, nickname, phone number, avatar, etc., because such data allows other people to find you and communicate with you, which is one of the task for the Sapien application and Sapien should process such data in order to execute a contract concluded between Sapien and the user.

Example 2

This example illustrates one of the cases when Sapien uses user's data for fixing bugs in the Services. Sapien collects device model information, operating system version embedded in the device, screen format in the device from which the user enters the Services, so that if the user has any technical problems with the work of the Services, the support team could solve this technical issue.

Example 3

This example illustrates one of the cases when Sapien uses user's data for the purpose of improving and enhancing of the Services and developing and introducing of new services and functions. Sapien collects device language data to display all information, including informational messages in language, which is convenient for the user. Sapien tracks the behavior of users in the Services, for example, how often a user has used some function or pushed the button to improve the product design of the Services and make them user-friendly. Please note that Sapien under no circumstances does not interfere with your private life and does not violate the secrecy of your correspondence, Sapien only collects aggregated and anonymous analytical information about which buttons the users frequently clicked or which functions the users frequently used.

Example 4

This example illustrates one of the cases when Sapien uses user's data for the purpose of the safety and security of the users of the Services and the safety and security of the provision of the Services. Sapien collects data about a unique user device identifier for security purposes, in particular, to prevent so-called bots from using the Services, for example, when a large number of users are logged in from one phone but from different numbers – this creates excessive load on Sapien's infrastructure and is a signal for Sapien about a suspicious user.

Example 5

This example illustrates one of the cases when Sapien uses user's data for the purposes of profiling of the users and making on its basis automated decisions (including solely automated decisions). If you need more information on profiling, you can find it in the section on profiling. By watching your behavior in the Services, Sapien can make certain assumptions about your interests and preferences, Sapien may offer you certain products that are similar to those that you have previously purchased or viewed.

Example 6

This example illustrates one of the cases when Sapien uses user's data for the purpose of profiling to display targeted advertisements.

Provided the user wants to view the advertisement, in order to show to the user the advertisements that fits with the preferences and interests of such user, Sapien will use personal data of the user. For example, if Sapien sees that the user spends his or her time at the stadium, such user may be offered advertisement of sporting goods or sporting events. You can find more information on the process of profiling in the section on profiling. Sapien respects your privacy, you can always withdraw your consent to process your data for the above-mentioned purpose.

Example 7

This example illustrates one of the cases when Sapien uses user's data for advertising and marketing activities. Sapien collects user's location data and, based on this, may send him or her the relevant advertisements and marketing messages that, in particular, relate to events, which take place near the user's location. Sapien respects your privacy, you can always withdraw your consent to process your data for the above-mentioned purpose.

Example 8

This example illustrates one of the cases when Sapien uses user's data to comply with the requirements of the legislation and the requirements of third parties (including but not limited to the requirements, notice, claims of copyright and trademark holders). Sapien collects information about user's name, surname, e-mail, telephone number in order when some disputes or claims from third parties arise, particularly, when holder of some intellectual property rights reports a notice about infringement of intellectual property rights by certain user, Sapien can provide to such holder of some intellectual property rights with user's contact information.

Example 9

This example illustrates one of the cases when Sapien uses user's data to monitor the compliance of users with the requirements of the Services terms and conditions. Sapien collects information about a unique device identifier to prevent the registration of so-called bots from one device, but from many telephone numbers. Sapien may monitor posts and content, which is published by the user in order to prevent publishing of the content, which violates the Services terms and conditions.

Example 10

This example illustrates one of the cases when Sapien uses user's data to communicate with the user. For example, if Sapien wants to notify you of important information about changes in this Policy or in connection with the recovery of access to your account. Sapien can contact you using the personal data that you provided.

WHY DOES SAPIEN COLLECT SO MUCH DATA?

Sapien respects the principle of "data minimisation" and collects and processes data based on this principle. Sapien collects so much data only for the purposes specified in this Policy.

HOW LONG DOES SAPIEN STORE MY PERSONAL DATA?

Sapien stores your personal data only when it is necessary for you or Sapien for the purposes indicated in this Policy. The last one also applies to any other third person who performs certain actions on behalf of Sapien. If Sapien does not need certain information about you and does not need to store information about you in accordance with the requirements of the law, Sapien will delete it or will store it in anonymized way.

PROFILING AND ADVERTISING

For Sapien could offer advertisers better recommendations for placing advertisements among users, Sapien will use the profiling process for each user.

Based on the collected user data and user profile data, results on ads that might be interesting to the user are generated by Sapien software algorithms.

Below are some examples that will help you understand the essence of profiling and its consequences for you:

- For example, if Sapien sees that a user is often in the city center based on user-geolocation data, this user can see coffee shops, restaurants, other events, etc. in the city center.
- Similarly, the user can see sports clothing advertising, if according to geolocation data Sapien sees that the user is in a gym or at a sport event.

It is important to remember that Sapien never transmits and sells data that was collected about a specific user to the advertisers. Sapien respects your rights, and in case you wish to refuse to have your data processed for marketing or advertising purposes, you can always change it in the application settings.

You also have the right to know about all the personal data that Sapien may process, including your profile data that Sapien has formed. For example, based on user data processing, Sapien can rank users according to different categories, such as "Drivers", "Android users", and others.

ANYWAY, HAVING RIGHTS ACCESS TO PERSONAL INFORMATION, YOU MAY ALWAYS FIND OUT WHAT KIND OF DATA HAS BEEN COLLECTED ABOUT YOU AND WHAT KIND OF PROFILE HAS BEEN FORMED BY SAPIEN FOR THE CURRENT DATE.

If you think that the advertisement that you see have a significant impact on you and your rights, you may ask Sapien to explain why you see such advertisement, or you may contest such advertisement, request human intervention, so that the offers can be displayed taking into account human intervention, but not automatically. The above rights are not absolute and in some cases may not be applied.

PROFILING, ADVERTISING AND SENSITIVE DATA

Sapien strives to be honest with you and provide you with transparent information about how your personal data is processed and the consequences it may have for you. Handling user personal data Sapien may receive certain information about a user that may be treated as sensitive data that became known to Sapien as a result of observing the user's activity in the Services, though the user did not directly provide this data. Such sensitive data includes: data on racial or ethnic origin of a user, data about user's political views, data about the religious or philosophical beliefs of a user, data on user participation in trade unions, health data, data about the sexual orientation of a user, data regarding the sexual life of a user.

Below are some examples that will help you understand how this might happen:

- for example, if according to user-generated geolocation data, Sapien sees that the user often goes to church, so Sapien can assume that the user is a religious person and belongs to a particular religion;
- or, if a user frequently attends a dental clinic, Sapien can make some conclusions about the health of the user.

Sapien may also use such data in the process of profiling and, as well as for marketing and advertising purposes. For example, if a user frequently attends a dental clinic, Sapien can make some conclusions about the health of the user and the user can see some promotional offers of dental clinics.

In case something about profiling and its consequences is unclear for you, you can always write on sapien.promo@gmail.com Here you will receive help and necessary explanations.

Sapien respects your rights, and in case you wish to refuse to have your data processed for marketing or advertising purposes, you can always change it in the application settings.

HOW CAN I CONTROL MY DATA (YOUR RIGHTS IN RESPECT TO YOUR DATA)?

RIGHT TO ACCESS TO PERSONAL DATA

You have a right to access the data that Sapien collects about you. To exercise this right, please send a request to the following email address: sapien.promo@gmail.com

Sapien may ask you to carry out additional verification procedures to ensure that the information is provided to the right user. Sapien responds to such requests for free, but a user abuse can lead to the fact that Sapien will refuse to process the request or will ask such a user to pay a fee.

THE RIGHT TO OBTAIN A COPY OF YOUR PERSONAL DATA

You have a right to download a copy of all data that Sapien collects about you based on your consent and on the contract that exists between you and Sapien. To exercise this right, please send a request to the following email address: sapien.promo@gmail.com

Sapien may ask you to carry out additional verification procedures to make sure that the data is provided to the right user. Sapien responds to such requests for free, but a user abuse can lead to the fact that Sapien will refuse to process the request or will ask such a user to pay a fee.

THE RIGHT TO DATA CORRECTION

You have the right to change your personal data if data, that Sapien has at its disposal, are outdated or inaccurate. You can change your profile information in your profile settings. In case you have difficulties in changing your information, please contact Sapien at sapien.promo@gmail.com

THE RIGHT TO BE FORGOTTEN

In certain cases, you have the right to ask Sapien to remove the data that Sapien has about you. For example, you can do so if you withdraw your prior consent or if you object to processing of your personal data based on legitimate interest and Sapien does not have any interest that prevails over your rights, freedoms and interests. To exercise this right, please contact Sapien at the following email address: sapien.promo@gmail.com

Sapien may ask you to perform additional verification procedures to make sure that the appropriate user has contacted it. There are certain cases in which the above described right cannot be exercised. Sapien will inform you if they occur.

Please note if you delete your account, some personal data will remain in Sapien's system in anonymized form, it will be stored in such a way that it will be impossible to identify the user. This is necessary to give Sapien an opportunity to check whether a user was previously registered or not. Sapien will use such data only in order to prevent fraud, when a user who violates the terms and conditions and whose account was deleted will attempt to re-register within the Sapien system again. By saving such data, Sapien will rely on its legitimate interest.

THE RIGHT TO RESTRICTION OF PROCESSING

In certain cases, you have the right to ask Sapien to restrict the processing of personal data about you. For example, if you object the processing of personal data about you based on a legitimate interest pending the determining whether there is a legitimate interest that prevails. For example, when you object to processing, Sapien may freeze your account and not collect any information about you for a certain time until Sapien finds out whether your interests, rights and freedoms prevail over Sapien's interests or interests of third parties.

To exercise this right, please contact Sapien at the following email address: sapien.promo@gmail.com

Sapien may ask you to perform additional verification procedures to make sure that you are the appropriate user.

THE RIGHT TO OBJECT

If processing of personal data is based on legitimate interest, you have a right to object such processing. If Sapien does not have an interest that outweighs your rights, interests and freedoms, Sapien will stop processing your data. To exercise this right, please contact Sapien at the following email address: sapien.promo@gmail.com
Sapien may ask you to perform additional verification procedures to make sure that you are the appropriate user.

I HAVE SUBMITTED THE REQUEST TO SAPIEN. WHEN WILL THE RESPOND COME?

As a rule, Sapien will process your request and will respond to it within 90 calendar days from the receipt of the corresponding request from you. In some cases, this period may be extended by two months. This might occur, for example, for technical reasons or because of big inflow of requests.

DO I HAVE TO PAY FOR SUBMITTING MY REQUEST?

No, you don't. Sapien accepts and processes the requests for personal data free of charge. However, if there are reasons for Sapien to believe that requests are sent unfairly, Sapien reserves the right to refuse processing such requests or to establish a reasonable fee for such processing.

CONTACT SAPIEN

The Services, the Sapien application, and website <https://Sapien.community> belong to Sapien.

Should you have any questions do not hesitate to contact Sapien using following contacts:

Address: sapien.promo@gmail.com

CHANGES TO THE POLICY

In case of changes to this Policy, Sapien will notify you of this. If the changes in this Policy are significant, Sapien will do its best to inform you about the changes and to make such changes clearly introduced to you. If changes to this Policy are not significant, Sapien will notify you of such changes by posting the updated Policy on website and in the relevant section of the application

MISCELLANEOUS

This Policy comes into force on November 25, 2018.